

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CAPITAL TRUST HOLDING AG,

Plaintiff,

-against-

RAINMAKER INTERNATIONAL, INC.,

Defendant.

Index No.: 07 Civ. 7318
Hon. Colleen McMahon

**NOTICE OF CROSS-
MOTION**

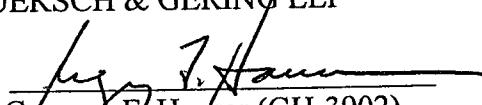
PLEASE TAKE NOTICE, that on the declaration of Hany Salem, dated

September 25, 2007, the summons and complaint, and on all other proceedings had
herein, the undersigned counsel for Plaintiff will cross-move this Court, before the
Honorable Colleen McMahon, Courtroom 21B, at the United States Courthouse for the
Southern District of New York, 500 Pearl Street, New York, New York, at a date and
time to be set by the Court, for an Order pursuant to Fed. R. Civ. P. 65(a) preliminarily
enjoining the Defendant from selling or otherwise transferring Plaintiff's four million
non-collateralized shares of Boulder Steel Ltd. currently in Defendant's possession or
control, and for such other and further relief as the Court deems just and proper.

Dated September 26, 2007

WUERSCH & GERING LLP

By:


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